

As hackers begin new methods of breaking in to systems by using local lines instead of 800 numbers, the LECs should be required to offer monitoring services similar to the IXC's.

I applaud the provisions outlined in the NPRM on shared liability. They are fair and equitable. Shared liability will require clear definitions of the specific responsibilities of the CPE owner to secure their equipment, the manufacturer to adequately warn the customer of the toll fraud risks associated with features of the CPE, and the IXC's and LEC's to offer detection and prevention programs and educational services. If toll fraud occurs and one of the parties should fail to meet these responsibilities and prove to be negligent, then they should bear the cost of the fraud. I do not believe any damages should be awarded to the aggrieved parties. Should all parties have met the aforementioned responsibilities, and toll fraud occurs, then liability should be shared equally.

However, shared liability only addresses the symptom of the problem of toll fraud and not the cause.

The root of this insidious crime of toll fraud is the hacker community. As the information highway widens, so do the endless opportunities for hackers to compromise our communication systems. I do not believe it when the hackers state they only 'hack' to gain knowledge. If this were the case, there wouldn't be a toll fraud problem. While it is the hacker who breaks in to the systems and sells the information, it is the call sell operations that truly profit from it.

Until we come up with an adequate method for law enforcement to catch and prosecute these criminals, toll fraud will continue to grow beyond the \$5 billion problem it is today. We must develop legislation that clearly defines and penalizes this criminal activity and gives law enforcement the tools it needs to track and prosecute the perpetrators of toll fraud.

Toll fraud is an illegal, fraudulent theft of service. I am encouraged that if we all work together we can make a positive impact on this terrible problem.

Sincerely,

VIEWLOGIC Systems, Inc.



Patricia Anzivino
Office Manager

January 11, 1994

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JAN 24 1994

FCC MAIL ROOM

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Re: CC Docket no. 93-292

Dear Mr. Canton:

I am a telecommunications professional who is responsible for my company's telecommunication systems and I am painfully aware that although I may reduce the risk, no matter how many steps I take to secure my systems, I am still vulnerable to toll fraud. That is why I am so encouraged by the proposed rule making.

PBX owners should not be responsible for 100% of toll fraud if we are not controlling 100% of our destiny. This destiny is ultimately controlled by not only our implementation and proper use of PBX security features but by the information, equipment and services provided by IXCs, LECs and CPE vendors. The legal obligations of the IXCs, LECs and CPE vendors should provide the proper incentive to reduce and eliminate all toll fraud.

Current programs offered by some IXCs (Sprint Guard™, MCI Detect™, and AT&T Netprotect™) and insurance companies are too expensive. Monitoring and proper notification by the IXCs must be a part of the basic interexchange service offerings. This should eliminate cases of toll fraud greater than 24 hours.

LECs must also provide monitoring and proper notification as a part of their basic service offerings. Local lines are as vulnerable to toll fraud. As the line between IXC and LEC becomes fuzzier, monitoring and proper notification by all carriers will be even more applicable.

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CPE vendors need to provide telecommunications security as a cost of doing business instead of an opportunity to sell additional products and services. CPE vendors should be required to provide warnings about the risks of toll fraud, as it specifically relates to their equipment and provide solutions to reduce the risk of toll fraud. All CPE should be delivered without standard default passwords, which are well known to the criminal community. All login IDs, including those used by the vendor, should be disclosed at the time of purchase and at installation. All customer passwords should be changed or created at installation and the customer should receive written assurance that all vendor passwords will meet minimum requirements regarding length, change schedule, and alpha numeric format. CPE vendors should be encouraged to offer security related hardware and software in the price of their systems.

The provisions outlined in the NPRM are fair and equitable. Shared liability will require clearly defining the responsibilities of the;

- CPE owner to secure their equipment
- CPE vendors to warn customers of the specific toll fraud risks associated with their equipment
- IXC's and LEC's to offer detection, notification, prevention, and education offerings and services

If toll fraud occurs due to the negligence of one or more parties then the financial loss should be equitably distributed among those negligent parties. If there is no proven negligence the financial loss should be equitably distributed among CPE owner; and all CPE vendor(s), LEC(s) and IXC(s) involved.

Toll Fraud is a financially devastating problem that affects the entire telecommunications industry including users, vendors and carriers. I am sure, that if we all work together we can and will make a positive impact on this problem.

Sincerely,





University of Pittsburgh

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Computing and Information Services
Telecommunications

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JAN 24 1994

FCC MAIL ROOM

6K01 Forbes Quadrangle
Pittsburgh, Pennsylvania 15260
412-648-5900
Fax: 412-648-5911
Telex: 199126 UNIVERSITY PGH OR
812466 UNIVERSITY PGH

January 13, 1994

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Dear Mr. Canton,

I am very encouraged by the current language in your proposed rule making (CC Docket # 93-292) regarding toll fraud. Toll fraud is a financially devastating problem that effects the entire telecommunications industry.

Although I may be able to reduce my risks, no matter how many steps I take to secure my systems and trunking, I am still vulnerable to toll fraud. PBX owners are not able to completely control their environment. Although we can and should be responsible for implementing and properly using PBX security features, our options are controlled by what is provided by the IXC's, LEC's and CPE vendors. PBX owners must not be responsible for 100% of the toll fraud.

Current programs offered by some IXC's (Sprint Guard, MCI Detect and AT&T Netprotect) and insurance companies are too expensive. The IXC's and LEC's should be required to provide monitoring and prompt notification as a fundamental part of their basic service. They must also be required to be pro-active in the use of network technologies to improve defenses against toll fraud as a part of their basic service.

CPE vendors must not ship equipment with default passwords. Password lengths and alpha-numeric formats must meet acceptable computer industry standards. Password aging must be a standard option along with dial back modems or other proven technologies to secure access. CPE vendors must clearly identify any features that pose a risk of toll fraud and provide detailed information on the nature of the risk. Finally, CPE vendors must provide this security as a cost of doing business rather than as an opportunity to sell additional products and services.

The elimination of this problem requires a cooperative approach rather than an adversarial one. The changes in technology and networks that are the exciting future are also the sources of toll fraud opportunities. Service and equipment providers must provide us with the tools to protect us from this activity.

Sincerely,

Bruce Hutchison
Director of Telecommunications

pc: File

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Chris

January 11, 1994

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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JAN 24 1994
FCC MAIL ROOM

Re: CC Docket no. 93-292

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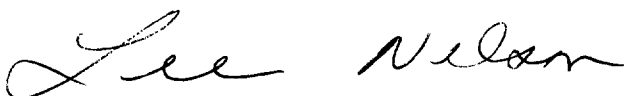
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Toll Fraud is a financially devastating problem that affects the entire telecommunications industry including users, vendors and carriers. I am sure, that if we all work together we can and will make a positive impact on this problem.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lee Nelson".



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JAN 24 1994

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PHOENIX SUNS PLAZA • 201 EAST JEFFERSON STREET • PHOENIX, ARIZONA 85004 • MAILING ADDRESS: P.O. Box 433 • PHOENIX, ARIZONA 85001 • (602) 379-2000 OFFICE • (602) 379-2002 FAX

January 11, 1994

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

RE: CC Docket 93-292

Dear Mr. Canton:

It was with great interest I read the recent FCC Notice of Proposed Rulemaking concerning Toll Fraud. As a telecommunications professional who is responsible for my company's communications systems, I am encouraged by the proposed rulemaking because even though I have taken each and every protective step recommended by the IXC's and CPE vendors to secure my systems, I can still experience toll fraud. It is impossible to secure my system 100% from fraud.

PBX owners should not be responsible for 100% fraud if we don't control 100% of our destiny. Since our destiny is not only controlled by our PBX security precautions, but also by the information, services and equipment provided IXCs, LECs and CPEs, the law should reflect that. It is preposterous to think that the IXCs, LECs and CPEs who all have a very important part in this issue, have absolutely no legal obligations to warn customers and therefore, no real incentive to stop fraud.

CPEs should be required to provide warnings about the risks of toll fraud with their equipment and provide recommended counter methods. It is critical that CPEs ship equipment without default passwords which are well known within the hacker community. Passwords should be created during the installation of the equipment with the customers full knowledge. CPEs should be required to include security-related hardware and software in the price of their systems. When you buy a car, the lock and key are provided in the design and price of the car. Not an adjunct that you have to purchase later.

While the programs offered by IXCs, such as MCI Detect, AT&T NetProtect and Sprint Guard have broken new ground in relation to preventing toll fraud, they still don't do enough. Some of these services are too expensive for smaller companies and the educational information is superficial.

• BUILDING PARTNERS •

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Monitoring by the IXC's should be a part of the basic interexchange service offerings, as all companies, large and small, are vulnerable to toll fraud. If the IXC's were monitoring all traffic, there wouldn't be any cases of toll fraud for periods longer than a day.

As hackers begin new methods of breaking in to systems by using local lines instead of 800 numbers, the LEC's should be required to offer monitoring services similar to the IXC's.

I applaud the provisions outlined in the NPRM on shared liability. They are fair and equitable. Shared liability will require clear definitions of the specific responsibilities of the CPE owner to secure their equipment, the manufacturer to adequately warn the customer of the toll fraud risks associated with features of the CPE, and the IXC's and LEC's to offer detection and prevention programs and educational services. If toll fraud occurs and one of the parties should fail to meet these responsibilities and prove to be negligent, then they should bear the cost of the fraud. I do not believe any damages should be awarded to the aggrieved parties. Should all parties have met the aforementioned responsibilities, and toll fraud occurs, then liability should be shared equally.

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Until we come up with and adequate method for law enforcement to catch and prosecute these criminals, toll fraud will continue to grow beyond the \$5 billion problem it is today. We must develop legislation that clearly defines and penalizes this criminal activity and gives law enforcement the tools it needs to track and prosecute the perpetrators of toll fraud.

Toll fraud is an illegal, fraudulent theft of service. I am encouraged that if we all work together we can make a positive impact on this terrible problem.

Sincerely,



Vicki Berryman
Director of Communications
(602) 379-2099

VB:tmc



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JAN 24 1994

FCC MAIL ROOM

January 10, 1993

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

RE: CC Docket 93-292

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Toll fraud is an illegal, fraudulent theft of service. I am encouraged that if we all work together we can make a positive impact on this terrible problem.

Sincerely,

Lydia Rosenblatt
Director of Telecommunications

January 11, 1994

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Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

JAN 24 1994

FCC MAIL ROOM

Re: CC Docket no. 93-292

Dear Mr. Canton:

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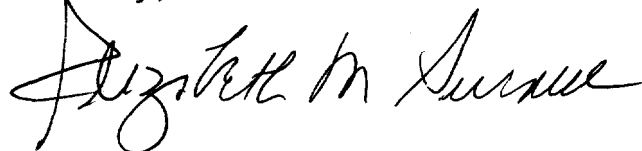
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Toll Fraud is a financially devastating problem that affects the entire telecommunications industry including users, vendors and carriers. I am sure, that if we all work together we can and will make a positive impact on this problem.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elizabeth M. Surace". The signature is written in dark ink on a white background.



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Praxair, Inc.
Post Office Box 44
Tonawanda, NY 14151-0044
Tel (716) 879-2000

January 11, 1994

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JAN 24 1994

FCC MAIL ROOM

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Re: CC Docket no. 93-292

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[Signature]

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Sincerely,



Michael Britt
Supervisor
Telecommunication Services

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JAN 24 1994

MINNESOTA MUTUAL

January 13, 1993

FCC MAIL ROOM

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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Sincerely,



Jeanne M. Malone
Manager, Telecommunications

January 11, 1994

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JAN 24 1994

FCC MAIL ROOM

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Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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Sincerely,

Brenda O'Neil
United Missouri Bank
816-860-4950

January 11, 1994

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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JAN 24 1994

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Aug.

CPE vendors need to provide telecommunications security as a cost of doing business instead of an opportunity to sell additional products and services. CPE vendors should be required to provide warnings about the risks of toll fraud, as it specifically relates to their equipment and provide solutions to reduce the risk of toll fraud. All CPE should be delivered without standard default passwords, which are well known to the criminal community. All login IDs, including those used by the vendor, should be disclosed at the time of purchase and at installation. All customer passwords should be changed or created at installation and the customer should receive written assurance that all vendor passwords will meet minimum requirements regarding length, change schedule, and alpha numeric format. CPE vendors should be encouraged to offer security related hardware and software in the price of their systems.

The provisions outlined in the NPRM are fair and equitable. Shared liability will require clearly defining the responsibilities of the;

- CPE owner to secure their equipment
- CPE vendors to warn customers of the specific toll fraud risks associated with their equipment
- IXC's and LEC's to offer detection, notification, prevention, and education offerings and services

If toll fraud occurs due to the negligence of one or more parties then the financial loss should be equitably distributed among those negligent parties. If there is no proven negligence the financial loss should be equitably distributed among CPE owner, and all CPE vendor(s), LEC(s) and IXC(s) involved.

Toll Fraud is a financially devastating problem that affects the entire telecommunications industry including users, vendors and carriers. I am sure, that if we all work together we can and will make a positive impact on this problem.

Sincerely,

Cathy Messmer
Associate Mgr. Telecommunications
Great West Life & Annuity
(305) 689-3800

January 11, 1994

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RECEIVED

JAN 24 1994

FCC MAIL ROOM

Re: CC Docket no. 93-292

Dear Mr. Canton:

I am a telecommunications professional who is responsible for my company's telecommunication systems and I am painfully aware that although I may reduce the risk, no matter how many steps I take to secure my systems, I am still vulnerable to toll fraud. That is why I am so encouraged by the proposed rule making.

PBX owners should not be responsible for 100% of toll fraud if we are not controlling 100% of our destiny. This destiny is ultimately controlled by not only our implementation and proper use of PBX security features but by the information, equipment and services provided by IXCs, LECs and CPE vendors. The legal obligations of the IXCs, LECs and CPE vendors should provide the proper incentive to reduce and eliminate all toll fraud.

Current programs offered by some IXCs (Sprint Guard™, MCI Detect™, and AT&T Netprotect™) and insurance companies are too expensive. Monitoring and proper notification by the IXCs must be a part of the basic interexchange service offerings. This should eliminate cases of toll fraud greater than 24 hours.

LECs must also provide monitoring and proper notification as a part of their basic service offerings. Local lines are as vulnerable to toll fraud. As the line between IXC and LEC becomes fuzzier, monitoring and proper notification by all carriers will be even more applicable.

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Sincerely,

Edie Kassabian
Manager, Telecommunications, CAC

530 Oak Court Drive, Suite 300
Memphis, Tennessee 38117
P.O. Box 171199
Memphis, Tennessee 38187-1199
901/767-4780

Real Estate
and Investments

January 19, 1994

RECEIVED

JAN 24 1994

FCC MAIL ROOM

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M. Street
Washington, DC 20554

Re: CC Docket 93-292

Dear Mr. Canton:

It was with great interest I read the recent FCC Notice of Proposed Rulemaking concerning Toll Fraud. As a telecommunications professional who is responsible for my company's communications systems, I am encouraged by the proposed rulemaking because even though I have taken each and every protective step recommended by the IXC's and CPE vendors to secure my systems, I can still experience toll fraud. It is impossible to secure my system 100% from fraud.

PBX owners should not be responsible for 100% of the toll fraud if we don't control 100% of our destiny. Since our destiny is not only controlled by our PBX security precautions, but also by the information, services and equipment provided IXCs, LECs and CPEs, the law should reflect that. It is preposterous to think that the IXCs, LECs and CPEs who all have a very important part in this issue, have absolutely no legal obligations to warn customers and therefore, no real incentive to stop fraud.

CPEs should be required to provide warnings about the risks of toll fraud with their equipment and provide recommended counter methods. It is critical that CPEs ship equipment without default passwords, which are well known within the hacker community. Passwords should be created during the installation of the equipment with the customers full knowledge. CPEs should be required to include security-related hardware and software in the price of their systems. When you buy a car, the lock and key are provided in the design and price of the car. Not an adjunct that you have to purchase later.

While the programs offered by IXCs, such as MCI Detect, AT&T NetProtect and Sprint Guard have broken new ground in relation to preventing toll fraud, they still don't do enough. Some of these services are too expensive for smaller companies and the educational information is superficial. Monitoring by the IXCs should be a part of the basic

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Mr. William F. Canton
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interexchange service offerings, as all companies, large and small, are vulnerable to toll fraud. If the IXC's were monitoring all traffic, there wouldn't be any cases of toll fraud for periods longer than a day. As hackers begin new methods of breaking in to systems by using local lines instead of 800 numbers, the LEC's should be required to offer monitoring services similar to the IXC's.

I applaud the provisions outlined in the NPRM on shared liability. They are fair and equitable. Shared liability will require clear definitions of the specific responsibility of CPE owner to secure their equipment, the manufacturer to adequately warn the customer of the toll fraud risks associated with features of the CPE, and the IXC's and LEC's to offer detection and prevention programs and education services. If toll fraud occurs and one of the parties should fail to meet these responsibilities and prove to be negligent, then they should bear the cost of the fraud. I do not believe any damages should be awarded to the aggrieved parties. Should all parties have met the aforementioned responsibilities, and toll fraud occurs, then liability should be shared equally.

However, shared liability only addresses the symptom of the problem of toll fraud and not the cause.

The roof of this insidious crime of toll fraud is the hacker community. As the information highway widens, so do the endless opportunities for hackers to compromise our communication systems. I do not believe it when the hackers state they only "hack" to gain knowledge. If this were the case, there wouldn't be a toll fraud problem. While it is the hacker who breaks into the systems and sells the information, it is the call sell operations that truly profit from it.

Until we come up with an adequate method for law enforcement to catch and prosecute these criminals, toll fraud will continue to grow beyond the \$5 billion problem it is today. We must develop legislation that clearly defines and penalizes this criminal activity and gives law enforcement the tools it need to track and prosecute the perpetrators of toll fraud.

Toll fraud is an illegal, fraudulent theft of service. I am encouraged that if we all work together we can make a positive impact on this terrible problem.

Sincerely,

BELZ ENTERPRISES


Ronald A. Belz
President



Farmland Industries, Inc.
Post Office Box 7305
Kansas City, Missouri 64116-0005
Telephone: 816 459-6000
Facsimile: 816 459-6979

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Federal Communications Commission
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